

WILLKIE FARR & GALLAGHER_{LLP}

787 Seventh Avenue
New York, NY 10019-6099
Tel: 212 728 8000
Fax: 212 728 8111

October 16, 2014

VIA EMAIL & ECF

Hon. Vincent Briccetti
United States District Court
Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

Re: *In re MPM Silicones, et al.*, Case No. 14-CV-7492 (VB)

Dear Judge Briccetti:

Appellees seek leave to submit a single omnibus brief in excess of 25 pages in response to the 40-page brief of Appellants BOKF, NA and Wilmington Trust, N.A. This letter is submitted by the Debtors, jointly with the other appellees Apollo Global Management, LLC and certain of its affiliated funds, the Ad Hoc Committee of Second Lien Noteholders, and Wilmington Savings Fund Society, FSB as Successor Indenture Trustee.

Appellants seek reversal of three of the Bankruptcy Court's determinations: (1) Appellants are not entitled to a so-called "make-whole premium" under their respective indentures; (2) Appellants' state law claims are disallowed under 11 U.S.C. section 502(b)(2) as unmatured interest; and (3) the decisions of the Supreme Court in *Till v. SCS Credit Corp.*, 541 U.S. 465 (2004) and the Second Circuit in *In re Valenti*, 105 F.3d 55 (2d Cir. 1997), require a formula approach to calculate the cramdown interest rate for the replacement notes to be issued to Appellants under the Plan of Reorganization.

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Appellees, who are represented by three different law firms, are coordinating our responsive arguments. We believe that a single consolidated brief, not to exceed 40 pages, is the most efficient and least duplicative way to respond to all the issues that Appellants raise. Appellees will make every effort to be as succinct as possible, but up to 40 pages may be needed to address the multiple issues Appellants raise in their brief.

Appellants do not object to this request.

Respectfully submitted,

/s/ Roger Netzer

Roger Netzer

cc: All Counsel of Record